

Issue 78

MSPs Contracting Directly with Customers

Possible Business Process Impacted by Allowing MSPs/MRSPs to Contract Directly with Customers:

1. Certification process for MSPs/MRSPs
2. DASR Submittal to UDC
3. Exchange of meter information through EMI, MIRN and MDCR forms
4. Requests for meter maintenance, replacement and testing
5. Coordination between MSP and MRSP to accommodate meter reading
6. Billing
7. Miscellaneous

Issues Raised for each Process

1. Certification process for MSPs/MRSPs

- Will it take longer for an MSP to get certified if they have to complete additional DASR testing?
- What if an MSP doesn't plan to submit DASRs; can they opt out of the additional testing?
- MSP/MRSP may need to complete EDI 810 and 820 testing.
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2. DASR Submittals to UDC

- How does an ESP know if the UDC has already received a DASR from an MSP to cover that customer's competitive metering work?
- How does the ESP get notified of DASR communications between the MSP and the UDC with updated/changed meter information?
- The existing State DASR Handbook must be reviewed to determine if it can be used to solve short-term solution.

3. Exchange of meter information through EMI, MIRN and MDCR forms

- What responsibility does the MSP have to communicate this information to the ESP?
- How will the ESP be able to keep all of the up-to-date meter information on a customer's meter unless this information is also provided to them by the MSP?
- Will the MSP be required to have a separate agreement with the customer's ESP to cover these responsibilities for information exchange?
- Who will communicate to the Scheduling Coordinator?

- Does the UDC need to send the EMI for the initial switch to the ESP if the MSP is contracting directly with the customer?
- Who's responsible for keeping the meter characteristics
- If the MSP/MRSP changes, who will be responsible for communicating the meter characteristics/meter data etc? The LS ESP? Old MSP/MRSP? Or UDC?

4. Requests for meter maintenance, replacement and testing

- If an ESP, UDC or MRSP suspects a problem with the meter, how do they request maintenance, replacement or testing from an MSP if the customer has direct contract with the MSP?
- Should the customer be notified of meter test results, meter changes etc.
- If an MSP responds to a request by the ESP, UDC or MRSP what is the process to communicate the results of the work...who's responsible for notifying the UDC, MRSP or the LS ESP.
- Need to add some incentive for the MSP to respond to meter problems reported by the MRSP or LS ESP.
- What incentive/requirements will the customer have to make sure that their MSP maintains the accuracy of the meter?
- Who is responsible if the metered data is not accurate for billing?

5. Coordination between MSP and MRSP to accommodate meter reading

- What incentive is there for the MSP to cooperate with the MRSP for meter reading purposes if the MSP contracts with the customer and the MRSP contracts with the ESP?
- What if the ESP's MRSP cannot read the metering system that the MSP sold to the customer?

6. Billing Impacts

- Does the MSP/MRSP bill the customer their own equipment and services charges or do they pass the data to the Consolidated Biller?
- If the charges are passed, how does the consolidated Biller reimburse the MSP MRSP their charges? (Timing requirements, short pays, no pays, etc.)
- Is there any UDC tariff impacts?
- If a customer opts for Dual Billing, they could receive up to 4 bills. One from the UDC, MSP, MRSP and ESP.
- Additional credit checks on the Consolidated Biller.

7. Miscellaneous

- Who is the "Default Provider" in cases where the customer has terminated the contract with the Competitive Provider or the contract is expired?

Would it be the responsibility of the LS ESP to provide the Competitive service for the customer? Since IOUs are unable to provide competitive services, the customer may need to be returned to Standard Offer if a new competitive provider is not secured.

- If an MSP/MRSP is contracting directly with the customer, the MSP/MRSP must file tariffs to do so.
- There are fundamental differences between the cooperatives and the IOUs such as:
 - The IOUs can not allow a Standard Offer customer to contract meter or meter reading services and remain Standard Offer customers. The Cooperatives can allow this, provided that they are not offering competitive services outside of their territory.
 - The rules require that the coops may have to provide competitive MSP/MRSP services as provider of last resort.